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May 6, 2015

Aloke Chakravarty
Steven Mellin
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William Weinreb
Assistant U.S. Attorneys
United States Courthouse
1 Courthouse Way, Suite 9200
Boston, Massachusetts 02210

Re: United States v. Dzhokhar Tsarnaev
Criminal No. 13-10200- GAO

Dear Counsel:

During today's cross-examination of Mr. Bezy, Mr. Mellin asked Mr. Bezy whether he knew that the Attorney General could overrule the USAO's request for renewal of SAMs. Please provide us with the number of instances where the Attorney General has overruled or otherwise declined a U.S. Attorney's request to renew a SAMs.

Additionally, after court adjourned you indicated that you will be calling Michelle Nicolet as a rebuttal witness. In anticipation of her testimony, please notify us if you intend to present evidence of breaches of SAMs-related security measures by inmates housed in the Special Security Unit. If so, please provide (a) the details regarding the breach or attempted breach you will refer to, and (b) what measures were taken to insure no similar breach would occur, and (c) any disciplinary action taken against an inmate for a SAMs breach.

Thank you for your attention to this matter.

Sincerely,

/s/ David I. Bruck

David I. Bruck
Judy Clarke
Miriam Conrad
William Fick
Timothy Watkins

Counsel for Dzhokhar Tsarnaev